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November 12, 2019

**VIA ECF & FACSIMILE**

Hon. Alvin K. Hellerstein  
U.S. District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007  
fax: (212) 805-7942

Re: *In the Matter of the Application of Orly Genger*, No. 19-cv-9319 (AKH)  
*In the Matter of the Petition of Dalia Genger*, No. 19-cv-9365 (AKH)

Dear Judge Hellerstein:

We represent the Orly Genger 1993 Trust, through Michael Oldner, Trustee, with respect to the above-referenced matters which were removed from Surrogate's Court in connection with Orly Genger's bankruptcy then pending in the Western District of Texas. We write to briefly respond to the submission of Kasowitz Benson Torres LLP seeking a 45-day extension of the time to respond to our remand motions. (ECF No. 12 in 19-cv-9319; ECF No. 12 in 19-cv-9365.)

As detailed in the remand motions, Ron Satija, the former Chapter 7 Trustee for Orly Genger, and by extension, his counsel Kasowitz Benson, lack standing, much less the authority, to maintain this removal action. Further, as Kasowitz Benson is no longer counsel to the Chapter 7 Trustee, it has no standing to make this request for an adjournment.

However, we have no objection to the Court delaying this matter *sua sponte* in order to give time for a new Chapter 7 Trustee (if any) to be appointed in New York.

Respectfully submitted,

*/s/ Adam Pollock*

Adam Pollock

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cc (via ECF):

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*Counsel for Arie Genger, creditor; and*  
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